

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JOSEPH J. PLUMERI II,

Civil Case No.: 1:19-cv-05896-FB-RER

Plaintiff,

v.

NOTICE OF MOTION

STEVEN B. BARGER,

Defendant.

PLEASE TAKE NOTICE that upon the annexed affidavit of Gary B. Eidelman dated February 12, 2020, the exhibits attached thereto, legal memorandum, and all pleadings and proceedings in this matter, the undersigned, on behalf of the Plaintiff Joseph J. Plumeri II moves this Court before the Honorable Frederic Block, United States District Court Judge, United States Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn New York 11201, for an Order of Default Judgment against Defendant Steven B. Barger pursuant to Fed. R. Civ. Pro. 55(b)(2), and for such other and further relief as the Court deems proper and just.

Dated: February 12, 2020

Respectfully submitted,

SAUL EWING ARNSTEIN & LEHR LLP

/s/ Gary B. Eidelman

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**UNITED STATES DISTRICT COURT
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Civil Case No.: 1:19-cv-05896-FB-RER

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CERTIFICATE OF SERVICE

STEVEN B. BARGER,

Defendant.

I hereby certify that a true and correct copy of the foregoing Notice of Motion for Default Judgment, Memorandum of Law in Support of Motion for Default Judgment, Affidavit of Gary B. Eidelman in Support of Motion for Default Judgment with exhibits, and Proposed Order for Default Judgment were served via ECF and Certified Mail postage prepaid on the following:

Steven B. Barger
1020 Linkside Drive
Birmingham, Alabama 35242
Defendant

/s/ Gary B. Eidelman
Gary B. Eidelman

Dated: February 12, 2020